

**Echevarria Law, PLLC**

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June 19, 2020

Hon. Vincent L. Briccetti  
United States Courthouse  
300 Quarropas Street, Room 630  
White Plains, New York 10601

Re: Wilkins v. United Parcel Service, Inc., *et al.*  
Case No.: 19-cv-08180  
Follow-up to Letter Motion for Discovery

Dear Judge Briccetti:

The undersigned represents Plaintiff in the above referenced matter.

The parties have compromised and agreed to hold virtual depositions but to allow those who want to appear personally with the stenographer to do so.

Plaintiff has agreed to be available for his deposition on July 16th. Defendants' counsel have agreed to make themselves available for depositions of parties Valent, Guzman and Robinson on dates between July 20-23, and for non-parties Griffin and Scala on dates between August 3-5, depending on the availability of the deponents.

Given that the discovery issues have been resolved, it is respectfully submitted that the pre-motion conference presently scheduled for June 22, 2020, is unnecessary.

Very truly yours,



Jennifer S. Echevarria

CC: Jamie Haar, Esq. (via ECF)